

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Northern Division**

**UNITED STATES OF AMERICA,
Plaintiff,**

v.

**50.44 Bitcoins (Callahan),
Defendant.**

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Civil No. _____

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VERIFIED COMPLAINT FOR FORFEITURE

The United States of America, through undersigned counsel, seeking forfeiture of **50.44 Bitcoins**, hereinafter also referred to as "defendant property," respectfully presents to the Court the following:

1. This Court has jurisdiction over this forfeiture action pursuant to 28 U.S.C. §§1345 and 1355, and 18 U.S.C. § 981.
2. Venue is proper in this Court pursuant to 28 U.S.C. §1395.
3. On or about December 29, 2014, the defendant 50.44 in Digital Currency Bitcoins was seized from Tom and Amanda Callahan at 4604 Payne Road, Hurlock, Maryland, pursuant to the execution of a seizure warrant in the State and District of Maryland.
4. Once seized, the defendant property was placed in the custody of the Department of Homeland Security, United States Secret Service, in the District of Maryland, where it remains.
5. The defendant property constitutes proceeds involved in transactions and attempted transactions in violation of 18 U.S.C. § 1960, and therefore, should be forfeited to the United States of America pursuant to 18 U.S.C. § 981(a)(1)(A).
6. Such forfeiture is based upon, but not limited to, the evidence outlined in the

attached Declaration of Brian Bonus, Special Agent, United States Secret Service.


WHEREFORE, the plaintiff prays as follows:

1. That any persons having an interest in the above-described defendant property be cited to appear herein and answer the Complaint;
2. That a Warrant in rem issue to the Department of Homeland Security, U.S. Secret Service, commanding them to arrest the defendant property;
3. That Judgment of Forfeiture be decreed against the defendant property;
4. That upon Final Decree of Forfeiture, the Department of Homeland Security should dispose of the defendant property according to law; and
5. That the plaintiff have such other and further relief as the case may require.

Respectfully submitted,

Rod J. Rosenstein
United States Attorney

November 30, 2015



Richard C. Kay
Assistant United States Attorney
36 South Charles Street, 4th Floor
Baltimore, Maryland 21201
(410) 209-4800

VERIFICATION

I, Richard C. Kay, declare under penalty of perjury as provided by 28 U.S.C. §1746, that the foregoing Complaint for Forfeiture in rem is based on reports and information furnished to me by the Department of Homeland Security, United States Secret Service, and that everything contained therein is true and correct to the best of my knowledge and belief.

A handwritten signature in blue ink, appearing to read "Richard C. Kay", is written over a horizontal line.

Richard C. Kay
Assistant United States Attorney

MEMORANDUM

DATE: November 30, 2015

TO: Valerie Gaines
Valerie Rhodes
U.S. Secret Service

FROM: Naquita C. Ervin
FSA Paralegal Specialist
U.S. Attorney's Office - District of Maryland

RE: **U.S. v. 50.44 Bitcoins (Callahan)**
Civil Action No.

CATS ID 15-USS-000489 / 101-777-40003

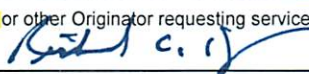
The United States has filed a forfeiture action against **50.44 Bitcoins (Callahan)**. A copy of the Complaint for Forfeiture is attached.

Notice of this seizure will be published at www.forfeiture.gov pursuant to Rule G of the Supplemental Rules for Admiralty or Maritime and Asset Forfeiture Claims.

Thank you.

Attachment

Department of Homeland Security
Federal Law Enforcement Agencies
PROCESS RECEIPT AND RETURN

PLAINTIFF UNITED STATES OF AMERICA		COURT CASE NUMBER	
DEFENDANT 50.44 Bitcoins (Callahan)		TYPE OF PROCESS Verified Complaint in Rem	
SERVE AT	Name Of Individual, Company, Corporation, Etc. to Serve or Description of Property to Seize		
	Address (Street or RFD / Apt. # / City, State, and Zip Code)		
Send NOTICE OF SERVICE copy to Requester: Naquita Ervin, FSA Paralegal Specialist U.S. Attorney's Office 36 S. Charles Street, 4th floor Baltimore, Maryland 21201		Number Of Process To Be Served In This Case.	
		Number Of Parties To Be Served In This Case.	
		Check Box If Service Is On USA	
SPECIAL INSTRUCTIONS or OTHER INFORMATION TO ASSIST IN EXPEDITING SERVICE (includes Business and Alternate Addresses, Phone Numbers, and Estimated Availability times.) Arrest property. Fill in the date of arrest in this process receipt and return our copy.			
Signature of Attorney or other Originator requesting service on behalf of <input checked="" type="checkbox"/> Plaintiff 		Telephone No. (410) 209-4800	Date Dec 1, 2015
SIGNATURE OF PERSON ACCEPTING PROCESS:		Date	
SPACE BELOW FOR USE OF TREASURY LAW ENFORCEMENT AGENCY			
I acknowledge receipt for the Total # of Process Indicated.	District of Origin No.	District to Serve No.	SIGNATURE OF AUTHORIZED TREASURY AGENCY OFFICER:
Date			
I hereby Certify and Return That I <input type="checkbox"/> PERSONALLY SERVED, <input type="checkbox"/> HAVE LEGAL EVIDENCE OF SERVICE, <input type="checkbox"/> HAVE EXECUTED AS SHOWN IN "REMARKS", the Process Described on the Individual, Company, Corporation, Etc., At The Address Shown Above or at the Address Inserted Below.			
<input type="checkbox"/> I HEREBY CERTIFY AND RETURN THAT I AM UNABLE TO LOCATE THE INDIVIDUAL, COMPANY, CORPORATION, ETC. NAMED ABOVE.			
NAME & TITLE of Individual Served If not shown above:		<input type="checkbox"/> A Person of suitable age and discretion then residing in the defendant's usual place of abode.	
ADDRESS: (Complete only if different than shown above.)		Date of Service	Time of Service <input type="checkbox"/> AM <input type="checkbox"/> PM
		Signature, Title and Treasury Agency	
REMARKS:			

TD F 90-22.48 (6/96)

Make (5) copies after form is signed. SEND ORIGINAL + 4 COPIES to TREASURY AGENCY. Retain Copy #5 for your file.